

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL
RECEIVED
MAY 30 1996

In the Matter of)
) IB Docket No. 95-22
Market Entry and Regulation)
of Foreign-affiliated Entities)

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AFFILIATION NOTIFICATION

Sprint Communications Company L.P., in accordance with Section 63.11 of the Commission's Rules, hereby submits this Affiliation Notification as required by the Commission's rules, as amended by the *Report and Order* released November 30, 1995 in the above-captioned proceeding.

63.11(c) Affiliated Carriers:

See Attachment A for a listing of Affiliated Carriers.

63.11(c)(1) Countries Served By Resale and Transit

Sprint provides service to the following countries that are served by France Telecom operating groups by resale or transit:

Guadeloupe
Martinique
St. Martin
St. Barthelemy
La Reunion
Guyane
Mayotte
St. Pierre et Miquelon
New Caledonia
French Polynesia

024

Wallis and Futuna
Madagascar

63.11 (c) (2) (i) Ownership

The partners of Sprint Communications Company L.P. are as follows:

General Partner: US Telecom, Inc.
2330 Shawnee Mission Parkway
Westwood, KS 66205

Limited Partners: UCOM, Inc.
2330 Shawnee Mission Parkway
Westwood, KS 66205

Utelcom, Inc.
2330 Shawnee Mission Parkway
Westwood, KS 66205

Sprint International Communications
Corporation
12490 Sunrise Valley Drive
Reston, VA 22096

63.11 (c) (2) (ii) Not applicable

63.11 (c) (2) (iii) Special Concessions

Sprint certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the U.S. and any foreign country which the applicant may serve under the authority granted under Section 214 of the Communications Act and pursuant to Part 63 of the Commission's Rules, and Sprint will not enter into such agreements in the future.

63.11(d) Non-dominant Regulation

Sprint Affiliates

Sprint is a nondominant carrier which lacks market power in the provision of international services to all countries except France and Germany. Its affiliations with Global One and Call-Net do not alter its nondominant status. Moreover, the fact that France Telecom and Deutsche Telekom have affiliates in other countries, as also reported herein (Attachment B), does not alter Sprint's regulatory classification to those countries.

Sprint is currently regulated as a dominant carrier for service between the United States and France and the United States and Germany. *In the Matter of SPRINT CORPORATION Petition for Declaratory Ruling Concerning Section 310(b)(4) and (d) and the Public Interest Requirements of the Communications Act of 1934, as amended, I-S-P-95-002, Declaratory Ruling and Order, FCC 95-498, released January 11, 1996, para. 140.*

With respect to Sprint's affiliate in Canada, Call-Net is a reseller and has no bottleneck facilities. It lacks market power and has no ability to discriminate against unaffiliated U.S. international carriers through preferential operating agreements, preferential routing of traffic, exclusive or more favorable transiting agreements,

or preferential domestic access and interconnection agreements.

Global One, the global partnership of Sprint, France Telecom and Deutsche Telekom, has established affiliates in many countries.* In all but Australia and New Zealand, it is a resale operator which lacks market power. As resale operators, the Global One affiliates do not control bottleneck facilities and have no ability to discriminate against unaffiliated U.S. international carriers through preferential operating agreements, preferential routing of traffic, exclusive or more favorable transiting agreements, or preferential domestic access and interconnection agreements. In Australia and New Zealand, Global One does own some international facilities; however, it is a new entrant into the market, lacks market power, does not control bottleneck facilities, and has no ability to discriminate against unaffiliated U.S. international carriers through preferential agreements.

Affiliates of France Telecom and Deutsche Telekom

Attached hereto as Attachment B is a copy of Sprint's previously submitted report, filed pursuant to paragraph 139 of the above-cited order, in which Sprint informed the Commission of the destination markets other than France and

* In some cases, the "Foreign Carrier" name shown on Attachment A for a Global One company is the proposed name or the one which is currently being processed.

Germany in which FT or DT may control a foreign carrier. Also attached as Attachment C is an associated listing of Sprint's authorizations.

As shown in Attachment B, France Telecom has listed foreign carriers that are the wireline and international telecommunications facilities-based operators in certain Caribbean countries and Madagascar and the international facilities-based operators in New Caledonia, French Polynesia, and Wallis and Futuna. Sprint is not authorized to provide direct service to these countries, and therefore serves them via resale and transit pursuant to Sprint's beyond authority. Sprint has no affiliation with the carriers it uses for resale. Thus, in accordance with Section 63.10(a)(4), Sprint should retain its nondominant status on these routes. In addition to resale, some traffic to the Caribbean countries is routed via transit with France Telecom, and some traffic to New Caledonia and French Polynesia is routed through New Zealand.

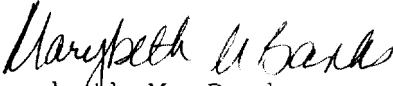
With respect to Argentina, France Telecom has only an indirect 9.75% equity interest in Telintar and a 10% equity interest in Sprint. The combination of France Telecom's indirect interest in Telintar and its noncontrolling interest in Sprint does not provide Telintar any incentive to discriminate against Sprint's competitors in the United States through preferential operating agreements,

preferential routing of traffic, exclusive or more favorable transiting agreements, or preferential domestic access and interconnection agreements. Further, Telintar should not be considered an affiliate of Sprint.

Other affiliates of France Telecom provide primarily data and mobile services. Thus, they do not control bottleneck facilities or otherwise possess market power. They have no ability to discriminate against unaffiliated U.S. international carriers through preferential operating agreements, preferential routing of traffic, exclusive or more favorable transiting agreements, or preferential domestic access and interconnection agreements.

Respectfully submitted,

Sprint Communications Company L.P.


Marybeth M. Banks
Director, Federal Regulatory Affairs

May 30, 1996

AFFILIATES OF SPRINT COMMUNICATIONS COMPANY L.P.

<u>Affiliate</u>	<u>Country</u>	<u>Foreign Carrier</u>	<u>Sprint Authorization FCC File Number</u>
Deutsche Telekom	Germany	Deutsche Telekom	ITC-88-015
France Telecom	France	France Telecom Group	ITC-86-132, ITC-86-023
Call-Net Enterprises, Inc.	Canada	Call-Net Enterprises, Inc.	ITC-84-158, ITC-86-023
Global One	Argentina	Global One Communications, S.A.	ITC-88-042
Global One	Australia	Global One Communications, Pty. Ltd.	ITC-85-029
Global One	Austria	Global One Communications, GmbH.	ITC-91-143
Global One	Belgium	Global One Communications, N.V.	ITC-86-023
Global One	Brazil	Global One Comunicacoes, Ltda.	ITC-87-116
Global One	Bulgaria	Global One Communications, PLTD & Global One Communications Business, Ltd.	ITC-92-008
Global One	Canada	Global One Communications, Inc.	ITC-84-158, ITC-86-023
Global One	Chile	Global One Communications, S.A.	ITC-88-177
Global One	Colombia	Global One Communications, S.A.	ITC-89-030
Global One	Cyprus	ROW Technical Operations & Management Services Limited	ITC-92-212
Global One	Czech Republic	Global One Communications, Limited	ITC-92-006
Global One	Denmark	Global One Communications, s.r.o.	ITC-87-116
Global One	Finland	Global One Communications, A/S	ITC-88-140
Global One	Hong Kong	Global One Communications, OY	ITC-86-023
Global One	Hungary	Global One Communications, Limited	ITC-91-031
Global One	India	Sprint RPG India Ltd.	ITC-90-178
Global One	Ireland	Global One Communications, Ltd.	ITC-88-042
Global One	Israel	Global One Communications, Limited	ITC-88-042
Global One	Italy	Global One Communications, S.p.A	ITC-86-023
Global One	Japan	Global One Communications, Inc.	ITC-86-091, ITC-86-023
Global One	Korea	Global One Communications, Inc.	ITC-88-023, ITC-88-176

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<u>Affiliate</u>	<u>Country</u>	<u>Foreign Carrier</u>	<u>Sprint Authorization FCC File Number</u>
Global One	Luxembourg	Global One Communications, S.A.	ITC-92-211
Global One	Mexico	Global One Communications, S.A. de C.V.	ITC-86-023, ITC-90-005
Global One	Netherlands	Global One Communications Trading, S.A. de C.V.	
Global One	New Zealand	Global One Communications, B.V.	ITC-86-023
Global One	Norway	Global One Communications, Limited	ITC-88-041
Global One	Panama	Global One Communications, AS	ITC-88-140
Global One	Poland	Global One Communications, Inc.	ITC-86-134, ITC-90-170, ITC-86-023
Global One	Portugal	Global One Communications, Sp.z o.o.	ITC-91-128
Global One	Russia	Global One Comunicacao, Limitada	ITC-88-177
		Global One Communications Operations, JSC	ITC-91-085
		Global One Communications, JSC	
Global One	Singapore	Global One Communications Networks, JSC	
Global One	South Africa	Global One Communications, Pte Ltd	ITC-88-003
		Global One Business Solutions (Pty) Limited	ITC-91-053
Global One	Spain	Global One Communications, S.A.	ITC-86-023
Global One	Sweden	Global One Communications Aktiebolag	ITC-87-116
Global One	Switzerland	Global One Communications, S.A.	ITC-88-041
Global One	Thailand	Global One Communications, Ltd.	ITC-88-098
Global One	Turkey	Global One Telekomunkasyon, Limited Sirketi	ITC-91-132
Global One	United Kingdom	Global One Communications Operations, Ltd.	ITC-85-016, ITC-86-012, ITC-86-023
		Global One Communications Holding, Ltd.	
		Global One Communications, Ltd.	
Global One	Ireland	Global One Communications GBN Holding, Ltd.	ITC-88-042
Global One	Ireland	Global One Communications Operations, Ltd.	ITC-88-042

Attachment A
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<u>Affiliate</u>	<u>Country</u>	<u>Foreign Carrier</u>	<u>Sprint Authorization FCC File Number</u>
Global One	Ireland	Global One Communications World Operations, Ltd.	ITC-88-042
Global One	Netherlands	Global One Communications, B.V.	ITC-86-023
Global One	Netherlands	Global One Communications Service, B.V.	ITC-86-023
Global One	Netherlands	Global One Communications World Holding, B.V.	ITC-86-023
Global One	Netherlands	Global One Communications World Service, B.V.	ITC-86-023



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Leon M. Kastenbaum
Vice President
Federal Regulatory Affairs

February 29, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: In the Matter of SPRINT CORPORATION Petition for
Declaratory Ruling Concerning Section 310(b)(4)
and (d) and the Public Interest Requirements of
the Communications Act of 1934, as amended,
I-S-P-95-002, released January 11, 1996, FCC 95-498 '1

Dear Mr. Caton:

Pursuant to Paragraph 139 of the above-captioned order, Sprint Corporation hereby files the attached information from FT and DT on destination markets other than France and Germany in which FT or DT may control a foreign carrier.

Sincerely,

A handwritten signature in dark ink, appearing to read "L M Kastenbaum".

Attachment

cc: Scott Harris
Diane Cornell
Kerry Murray



North America

February 28, 1996

**Leon M. Kestenbaum, Esq.
Vice President Federal Regulatory Affairs
Sprint
1850 M Street, N.W., 11th Floor
Washington, D.C. 20036**

Dear Leon:

Please find attached France Telecom's response to information requested pursuant to Paragraph 139 of the FCC Order (I-S-P-95-002).

Sincerely,

A handwritten signature in black ink, appearing to read "Theodore Krauss".

Theodore Krauss

Enclosure

Name of the foreign carrier	Destination markets other than France and Germany in which France Telecom controls a foreign carrier	Does the foreign carrier have market power	Type of international telecommunications service; other comments
France Telecom Group	Guadeloupe	Yes	wireline and international facilities-based operator
France Telecom Group	Martinique	Yes	wireline and international facilities-based operator
France Telecom Group	St. Martin	Yes	wireline and international facilities-based operator
France Telecom Group	St. Barthélemy	Yes	wireline and international facilities-based operator
France Telecom Group	La Réunion	Yes	wireline and international facilities-based operator
France Telecom Group	Guyane	Yes	wireline and international facilities-based operator
France Telecom Group	Mayotte	Yes	wireline and international facilities-based operator
France Telecom Group	St. Pierre et Miquelon	Yes	wireline and international facilities-based operator
France Telecom Group	New Caledonia	Yes	international facilities-based operator
France Telecom Group	French Polynesia	Yes	international facilities-based operator
France Telecom Group	Wallis and Futuna	Yes	international facilities-based operator
France Caraïbe Mobiles	Guadeloupe	No	mobile
France Caraïbe Mobiles	Martinique	No	mobile
France Caraïbe Mobiles	St. Martin	No	mobile
France Caraïbe Mobiles	St. Barthélemy	No	mobile

Name of the foreign carrier	Destination markets other than France and Germany in which France Telecom controls a foreign carrier	Does the foreign carrier have market power	Type of international telecommunications service; other comments
Telfintar	Argentina - see comments	Yes	France Telecom has an indirect 9.75% equity interest in, and arguably negative de facto control over, Telfintar (the international facilities-based operator) by virtue of the fact that Telfintar is 50% owned by Telecom Argentina (the wireline provider in the northern part of Argentina and approximately half of Buenos Aires) in which France Telecom has an indirect 19.5% equity interest and, arguably, over which it has de facto control. The other 50% of Telfintar is owned by Telefonos de Argentina (the wireline provider in the southern part of Argentina and more than half of Buenos Aires) in which, according to publicly-available information, Telefonos de España has a substantial investment and, possibly, control.
Interpac Italia	Italy	No	domestic and international data transmission
FTML	Lebanon	No	mobile
Sodetel	Lebanon	Uncertain (but negligible traffic to U.S.)	domestic and international data transmission
Interpac Luxembourg	Luxembourg	No	domestic and international data transmission
Telecom Malagasy	Madagascar	Yes (but negligible traffic to U.S.)	wireline and international facilities-based operator
Jetphone	United Kingdom	No	airplane-based air-to-ground
Nordphone	Sweden	No	public telephony license, not yet in operation

Name of the foreign carrier	Destination markets other than France and Germany in which France Telecom controls a foreign carrier	Does the foreign carrier have market power	Type of international telecommunications service; other comments
Viafax Belgium	Belgium	No	value added
Sodetem	Lebanon	No	value added
Telecom Plus	Senegal	No	value added
Viafax Espana	Spain	No	value added

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VIA TELEFAX (202) 822-4444

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**TO: Leon Kestenbaum
Sprint Communications Company**

FROM: Werner Mein

DATE: February 22, 1996

RE/BETR.:

Dear Leon:

Pursuant to paragraph 139 of the FCC's Sprint order, Sprint has to inform the FCC of any destination market in which FT or DT controls a foreign carrier.

On behalf of Deutsche Telekom, I would like to inform you that DT owns 50% of Magyarcom, a holding company, which, in turn, controls Matav, the Hungarian public telecommunications operator.

Regards,



cc: Klaus Mai

Attachment C

AFFILIATES OF FRANCE TELECOM AND DEUTSCHE TELECOM

<u>Affiliate</u>	<u>Country</u>	<u>Foreign Carrier</u>	<u>Sprint Authorization FCC File Number</u>
France Telecom	France	France Telecom Group	ITC-86-132, ITC-86-023
France Telecom	Guadeloupe	France Telecom Group	
		France Caraibe Mobile	
France Telecom	Martinique	France Telecom Group	
		France Caraibe Mobile	
France Telecom	St. Martin	France Telecom Group	
		France Caraibe Mobile	
France Telecom	St. Barthelemy	France Telecom Group	
		France Caraibe Mobile	
France Telecom	La Reunion	France Telecom Group	
France Telecom	Guyane	France Telecom Group	
France Telecom	Mayotte	France Telecom Group	
France Telecom	St. Pierre et Miquelon	France Telecom Group	
France Telecom	New Caledonia	France Telecom Group	
France Telecom	Fr. Polynesia		
France Telecom	Wallis & Futuna	France Telecom Group	
France Telecom	Argentina	Telintar	ITC-88-042
France Telecom	Italy	Interpac Italy	ITC-86-023
France Telecom	Lebanon	FTML and Sodeltel	ITC-94-341
France Telecom	Luxembourg	Interpac Luxembourg	ITC-92-211
France Telecom	Madagascar	Telecom Malagasy	
France Telecom	United Kingdom	Jetphone	ITC-85-016, ITC-86-012, ITC-86-023
France Telecom	Sweden	Nordphone	ITC-87-116
Deutsche Telekom	Hungary	Magyarcom	ITC-91-031